



1000532



Montera Jeff  
<MonteraJG@cdm co  
m>

To Jim Christiansen/EPR/R8/USEPA/US@EPA  
cc  
Subject FW Libby sap

04/29/02 01 36 PM

Jim,

I'll also make a hardcopy of all of the comments for you

Jeff

-----Original Message-----

From French, Craig [mailto:Cfrench@state mt us]  
Sent Wednesday, April 24, 2002 8 42 AM  
To Montera, Jeff  
Subject Libby sap  
Importance High

Jeff,

These comments are in response to the Libby Asbestos SAP dated April 8, 2002

Overall, the SAP is clear, except for the methods of analyzing asbestos. On page 5-15, under Analytical Methods, the SAP states SEM or IR methods will be used to analyze samples. More discussion should focus on the quantitative and qualitative natures of these methods. Since the site will eventually require action levels, our ability to quantify the LAA in a sample is important. SEM with energy dispersive X-ray spectroscopy is well suited for identifying LAA, however it is unclear how it can be used to come up with a percent by mass result. Please provide more insight into which methods will be used and for what purposes. Please indicate how we will quantify our results. Basically DEQ is concerned that these methods may be too subjective and this may be trouble for us down the road.

Perhaps the calibration schedule for the instruments (once a month) could be more frequent. Calibrations could be run before each batch of samples. More frequent calibration should help eliminate systematic errors.

5 4 1 5 Step 5. Develop a Decision Rule, last sentence of this section page 5-1, "a values" should be at values

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